

Exhibit

A

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

EMPLOYERS MUTUAL CASUALTY)	
COMPANY, an insurance company)	
incorporated in the State of Iowa;)	
)	CIVIL ACTION NUMBER
Plaintiff,)	
)	2:05 -CV-01108-DRB
V.)	
)	
ARNBERG & ALLEN CONSTRUCTION,)	
L.L.C.; STEPHEN D. ARNBERG,)	
JIM ALLEN, MICHAEL O. LUNSFORD)	
and DEBRA O. LUNSFORD.)	
)	
Defendants.)	

AFFIDAVIT OF CYNTHIA A. MARTIN

Before me, the undersigned authority, personally appeared Cynthia A. Martin,
who being first duly sworn, deposes and states as follows:

1. My name is Cynthia A. Martin. I am a resident citizen of the State of Alabama and am over the age of 19 years and am of sound mind. I am one of the attorneys of record of the plaintiff and the following affidavit is given based on my personal knowledge of the facts contained herein.

2. Stephen D. Arnberg was duly served with a copy of the summons, together with a copy of plaintiff's complaint on December 2, 2005.

3. More than twenty (20) days have elapsed since the date on which said defendant was served with summons and copies of the complaint.

4. This defendant has failed to answer or otherwise defend as to plaintiff's complaint, or serve a copy of any answer or other defense which he might have upon the undersigned attorney of record for the plaintiff.

5. To the best of my knowledge, this Defendant is not an infant, not insane and not in the military.

6. That this affidavit is executed by affiant herein in accordance with Rule 55 of the Federal Rules of Civil Procedure, for the purpose of enabling the plaintiff to obtain an entry of default against this defendant, for his failure to answer or otherwise defend as to the plaintiff's complaint.

Further the Affiant saith not.


CYNTHIA A. MARTIN

STATE OF ALABAMA)
JEFFERSON COUNTY)

I, the undersigned, a Notary Public in and for said County, in said State, hereby certify that Cynthia A. Martin, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of such instrument, Cynthia A. Martin executed the same voluntarily on the

day the same bears date.

Given under my hand, this 18th day of January, 2006.

Andy Lorange Seef
NOTARY PUBLIC
My Commission Expires: 12-13-06